

**From:** [Ansari, Ramin](#)  
**To:** [Finnegan, Ann](#)  
**Cc:** [Kirby, Lisa](#)  
**Subject:** LANXESS Fords facility - Emergency water line repair in a known area of PCB impacted soil  
**Date:** Friday, July 29, 2022 2:00:27 PM

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Dear Ann,

Thank you so much for picking up your phone while on vacation; much appreciated! This email is a written follow-up to our discussion this Tuesday morning. I am providing confirmation of the guidance I received from you, and putting in writing the verbal/immediate notification that I made on our call, with additional detail.

On Tuesday morning, July 26, 2022, LANXESS identified a leaking subsurface water supply line. The location of the leak is within the footprint of known PCB contamination at the site. Site PCB contamination is being managed by Weston who is performing their investigation and remediation of site PCBs under a risk-based cleanup and disposal approval by EPA dated March 30, 2005.

Our repair of the line is considered an emergency condition, because this line feeds the Effluent Pre-Treatment Plant which is critical to the operation of the production facility. The emergency/critical part of the water is used for eye-wash stations, safety showers, and once-per-shift backflush of treatment system equipment. We will arrange for an emergency water supply in the mean-time and in parallel are working with our vendor to arrange for the repairs, considering the PCB contaminated soil, necessary health and safety measures, and coordination of waste management and disposal. We anticipate starting the physical work on Monday August 1, 2022.

As we discussed, and per your concurrence, LANXESS will execute this emergency repair work in accordance with the "Performance Based Clean-up Disposal" standards. As such, all of the waste generated from areas where PCBs are present in-situ in environmental media or structures will be handled accordingly as TSCA waste to the extent the waste is so defined in 40 CFR 761.3 (defining PCB Remediation Waste and or PCB Bulk Product Waste). Further, unlike a "typical" Performance Based Clean-up where the remediation is completed to a PCB concentration of 1ppm, LANXESS will only be removing the necessary amount of soil to complete the repair, and the remaining surrounding in-place soil will continue to be managed under Weston's risk-based clean-up approval with EPA (this area is currently planned to be capped by Weston and deed noticed).

If you have any questions, please call or email me. Again, I appreciated your help on the above.

Best Regards,  
Ramin